

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

LISA MORRIS, MICHAEL BUI, and
TUMIKA WILLIAMS on behalf of themselves
and all others similarly situated,

Plaintiff,

v.

BANK OF AMERICA, N.A.,

Defendant.

CASE NO. 3:18-cv-157-RJC-DSC

**JOINT MOTION TO EXTEND TIME TO FILE THE JOINT STIPULATED
PROTECTIVE ORDER AND ESI DISCOVERY ORDER**

COMES NOW, Plaintiffs Lisa Morris, Michael Bui, and Tumika Williams on behalf of themselves and all others similarly situated (collectively, “Plaintiffs”), and Defendant Bank of America, N.A. (“BANA”) (collectively, the “Parties”), by and through counsel, and respectfully move this Court for an Order extending the proposed deadline to file a Joint Motion for Entry of Stipulated Protective Order and Electronically Stored Information (“ESI”) Discovery Order from the current proposed deadline of June 16, 2019 to July 2, 2019.

WHEREAS, on April 25, 2019 the Federal Rule of Civil Procedure (“Rule”) 26(f) conference of attorneys was held and attended by counsel for Plaintiffs and BANA;

WHEREAS, the Parties filed a Joint Certificate and Report of Rule 26(f) Conference and Proposed Discovery Plan on May 2, 2019 [Dkt. 46], which included a proposed June 16, 2019 deadline to file the proposed Stipulated Protective Order and Stipulated ESI Discovery Order;

WHEREAS, on May 31, 2019, the Court set a scheduling conference on June 25, 2019 to discuss this case generally, at which the proposed Protective Order and ESI Discovery Order may be discussed.

WHEREAS, subsequent to the Rule 26(f) conference, Parties have diligently engaged in working towards agreeing upon a proposed Protective Order and ESI Discovery Order, but have not yet done so.

WHEREAS, on June 14, 2019, the Parties met and conferred in regards to the proposed Protective Order and ESI Discovery Order and agreed that additional time is required to allow for further negotiations of the terms of the proposed Protective Order and ESI Discovery Order.

ACCORDINGLY, to facilitate and allow for additional negotiations on the proposed Protective Order and ESI Discovery Order, the Parties move for an extension to file the proposed Stipulated Protective Order and ESI Discovery Order from June 16, 2019 to July 2, 2019.

This 17th day of June 2019.

Respectfully submitted,

/s/ Brian A. Kahn

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2019, I electronically filed the foregoing document entitled **JOINT MOTION TO EXTEND TIME TO FILE THE JOINT STIPULATED PROTECTIVE ORDER AND ESI DISCOVERY ORDER** with the Clerk of the Court for the United States District Court, Western District of North Carolina using the CM/ECF system and served a copy of same upon all counsel of record via the Court's electronic filing system.

/s/ Brian A. Kahn
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